

Brian Litmans (AK Bar No. 0111068)  
Katherine Strong (AK Bar No. 1105033)  
TRUSTEES FOR ALASKA  
1026 W. Fourth Avenue, Suite 201  
Anchorage, AK 99501  
Phone: (907) 276-4244  
Email: blitmans@trustees.org  
kstrong@trustees.org

*Attorneys for SalmonState, Alaska Center, Alaska Community Action on Toxics, Alaska Wilderness League, Cook Inletkeeper, Defenders of Wildlife, Friends of McNeil River, McNeil River Alliance, National Parks Conservation Association, National Wildlife Federation, Sierra Club, and Wild Salmon Center*

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA**

BRISTOL BAY ECONOMIC DEVELOPMENT  
CORPORATION, *et al.*,

Plaintiffs,

v.

CHRIS HLADICK  
U.S. Environmental Protection Agency, *et al.*,

Defendants.

Case No. 3:19-cv-00265-SLG

SALMONSTATE, *et al.*,

Plaintiffs,

v.

CHRIS HLADICK,  
U.S. Environmental Protection Agency, *et al.*,

Defendants.

Case No. 3:19-cv-00267-SLG

**Exhibit 27, page 1 of 5**

TROUT UNLIMITED,

Plaintiff,

v.

U.S. ENVIRONMENTAL PROTECTION  
AGENCY, *et al.*,

Defendants.

Case No. 3:19-cv-00268-SLG

**DECLARATION OF TODD RADENBAUGH IN SUPPORT OF PLAINTIFFS'**

**JOINT OPENING BRIEF**

I, Todd Radenbaugh, state and affirm as follows:

1. My name is Todd Radenbaugh. I'm a member of the Sierra Club. I first joined Sierra Club in 2005, and my most recent continuous membership started February 1, 2016. I'm a resident of Dillingham, Alaska. Dillingham is located on Bristol Bay, the same watershed where the Pebble Mine has been proposed. My residence is located approximately 100 miles from the proposed mine site. I have lived at my residence in Dillingham since 2006.

2. I learned about the Pebble Mine project in 2005, right before I took a position as an adjunct professor at the Bristol Bay Campus of the University of Alaska Fairbanks (promoted to professor in 2015). I have long been an activist who promotes ecosystem health. I have participated in several public participation opportunities related to the Pebble Mine.

3. I am a professor of Environmental Science at UAF Bristol Bay Campus. I study Bristol Bay estuarine dynamics and foods webs. I conduct studies/assist students in

conducting studies in the Bristol Bay Estuaries. We monitor the health of the ecosystem by taking samples.

4. If the mine is built, I will feel compelled to conduct water quality monitoring downstream of the mine. I would volunteer my time to help collect data on outflows, ecosystem health, and other factors in order to make sure that my community and other communities impacted by the mine have immediate knowledge of any negative environmental effects. I would have to expend a lot of resources- time and energy- just to ensure that the mine isn't harming the ecosystem.

5. My ability to enjoy recreational activities and spiritually connect with nature in Bristol Bay is threatened by the proposed Pebble Mine. My friends, family, fellow community members all recreate in Bristol Bay. I walk out the door and I'm surrounded by Bristol Bay. I like to fish recreationally. I've hunted for moose in the Bristol Bay area. I enjoy hiking and spending time at spiritual vistas and other places. I've spent plenty of time in the watershed and hope to continue to enjoy the special features of the region into the future. However, my ability to enjoy this incredible landscape will be directly harmed if the Pebble Mine is built. I won't be able to enjoy these recreational activities the same way I do currently because the cloud of the Pebble Mine and its potential harm to the environment will hang over everything. Rather than relax and enjoy this incredible place, I will worry about what harm the mine will cause to myself and the ecosystem on which my current life depends.

6. I currently consume salmon from the Bristol Bay watershed and am worried that the salmon population will be significantly impacted if the mine is constructed. I would certainly consume less salmon from Bristol Bay if Pebble Mine were to be built.

7. The proposed Pebble Mine would change the ecological system of Bristol Bay and my way of life. Although the mine site is pretty far away from my residence, it would impact the entire Bristol Bay watershed ecosystem which I treasure. There are

**Exhibit 27, page 3 of 5**

Decl. of Todd Radenbaugh in Supp. of Pls.' Joint Opening Br.

Page 3 of 6

*Bristol Bay Economic Development Corp. v. Hladick*, Case No. 3:19-cv-00265-SLG

many places where I like to hike and spend time outdoors that I consider spiritual vistas which would be threatened by the mine. With climate change, the watershed is already facing problems with stream fragmentation, and the Pebble Mine would only worsen that. I've already noticed that nearby hikes are getting too mucky and it is hard to get around because of the rivers not having enough water- which would potentially become worse due to the mine.

8. I am worried that the life cycle of invertebrates, plants and wildlife in the area will be changed by the mine. We have already seen a shift in the types of plants and animal species in Dillingham due to the population growing and climate change. These shifts would be much more drastic if the mine were to be built. Invasive species, such as pike, have been decimating the population of king salmon in Alaska. Having a larger industrial influence would make things worse- bringing in more invasive species. The industrial traffic of boats, people, and equipment necessitated by the proposed Pebble Mine would increase the likelihood of the introduction of other invasive species in the lakes and streams impacted by the mine and its supporting infrastructure. As climate change causes warming in the area it will be prime habitat for invasive species.

9. I am concerned with two other main issues about the mine that would not only have an impact on my community but a global impact. The proposed site of the mine is on an earthquake zone/ near fault locations. An earthquake could damage the mine spoil impoundment dams causing toxic waste to flow into the Bristol Bay watershed- having significant impacts on the salmon runs, water quality and the ecosystem as a whole. Additionally, the site of the mine is in a migrating bird zone. The mine would be toxic for the birds – and would kill off birds. This would not only negatively impact in the Bristol Bay ecosystem but would have global negative ramifications. I am afraid of a similar situation which happened in Butte, Montana where flocks of geese migrating over Montana landed in a copper mine waste pool, heavily polluted, and the birds died en masse.

**Exhibit 27, page 4 of 5**

Decl. of Todd Radenbaugh in Supp. of Pls.' Joint Opening Br.

Page 4 of 6

*Bristol Bay Economic Development Corp. v. Hladick*, Case No. 3:19-cv-00265-SLG

10. All of my concerns regarding the Pebble Mine would be addressed if the U.S. Environmental Protection Agency and other government agencies fully evaluated the environmental impacts of the mine and prevented the mine project from moving forward. If that were to occur, I could continue to enjoy recreating in this incredible landscape, continue to consume salmon, and wouldn't have to devote considerable resources to monitoring the environmental impacts from the mine.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 21<sup>st</sup> day of November, 2019/

A handwritten signature in black ink, appearing to read "Todd Radenbaugh", is written over a horizontal line.

Todd Radenbaugh